

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Docket No. 3: 19-cr-255

GREGORY ROSSI


Defendant

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

STALKING
[18 U.S.C. § 2261A]

FILED
SCRANTON
SEP 03 2019
PER 
DEPUTY CLERK

From on or about August 1, 2018 and continuing through on or
about August 27, 2019, the defendant,

GREGORY ROSSI

with the intent to harass and intimidate another person, and to place
under surveillance with intent to harass and intimidate another person,
used the mail, an interactive computer service, an electronic
communication service and an electronic communication system of
interstate commerce to engage in a course of conduct that caused,
attempted to cause and would reasonably be expected to cause

substantial emotional distress to that person. The defendant committed the crime of stalking in violation of a temporary and final civil no-contact order.

In violation of Title 18, United States Code, Sections 2261A(2)(B) and 2261(b)(6).

THE GRAND JURY FURTHER CHARGES:

COUNT 2

PROHIBITED PERSON IN POSSESSION OF A FIREARM AND
AMMUNITION

[18 U.S.C. § 822(g)(8)]

On or about August 27, 2019, within the Middle District of Pennsylvania, the defendant,

GREGORY ROSSI,

knowing he was subject to a court order issued in the Court of Common Pleas of Luzerne County, Pennsylvania, on August 28, 2018, docket number 9283-2018, issued after a hearing of which he received actual notice, and at which he had an opportunity to participate, restraining him from harassing, stalking and threatening an intimate partner, and that by its terms explicitly prohibited the use, attempted use, and

threatened use of physical force against such intimate partner that would reasonably be expected to cause bodily injury, did knowingly possess in and affecting interstate commerce, the following firearms and ammunition,

No.	Make	Model	Type	Caliber	Serial #
1	Glock	23	Handgun	.40	GVV913
2	Beretta	96 Brigadier	Handgun	.40	BER133038
3	Taurus	Judge	Handgun	.45 LC/.410 Gauge	ER401754
4	Taurus	Judge	Handgun	.45 LC/.410 Gauge	BV676394
5	Glock	37	Handgun	.45	KXR161
6	Glock	21 Gen 4	Handgun	.45	VUD631
7	Glock	27	Handgun	.40	CCK625US
8	CZ	627	Rifle	204	A283897
9	Remington	7400	Rifle	30-06	C8014329
10	Benjamin Titan GP	BW8M22NP	Rifle	.22	N11X01712
11	Remington	1700	Rifle with 4-16 x 44 Vortex scope, serial number A16022970	.35	G6556925
12	Remington	7600	Rifle with Redfield 3- 9 scope	30-06	8472805
13	Colt	AR-15 A2	Rifle	.223	LGC046092
14	Marlin	1894	Rifle	.44	21101532

15	Remington	870 Police Magnum	Shotgun	12 gauge	D793509M
16	Remington	700	Rifle	.22-250	A6394177
17	Remington	700	Rifle with Vortex 6.5x20x50 scope, serial number G822459	.25-06	S6421807
18	CZ	527 Varmint	Rifle	.223	A180036
19	Weatherby	Mark V	Rifle with Vortex 6.5- 20x50mm scope, serial number G818516	.30	SS002270
20	Remington	1100	Shotgun	12 Gauge	N840226V
21	Winchester	Ranger Model 120	Shotgun	12 Gauge	L2185924
22	Weatherby	Mark V	Rifle with Leupold 4x12 Scope, Serial Number 192857B	.340	H231943
23	B.C. Miroku		Shotgun	12 Gauge	S351574
24	Marlin	917V5	Rifle with Nikon 3- 9x40mm scope, serial	.17 HMR	95671935

			number KJ304835		
25	Winchester	1200	Shotgun	12 Gauge	L637627
26	Remington	11-87 Super Magnum	Shotgun	12 Gauge	SM029913
27	Remington	Nylon 66	Rifle with Tasco 3- 7x20 scope	.22	A2405948
28	Charles Daly		Shotgun	12 Gauge	3110691
29	Remington	Wingmaster Model 870	Shotgun	12 Gauge	691870V
30	Remington	700	Rifle with Nikon 4.5x14x40 scope, serial number KK444566	.243	G6623735
31	Remington	700	Rifle with Vortex 6.5- 20x50 scope, serial number G807676	7mm	RR22916F
32	Remington	870	Shotgun	12 Gauge	V235321V
33	Savage	Axis	Rifle with Vortex 4x12 scope	.243	J042784
34	Savage	Axis	Rifle with Bushnell 4x16 scope	6.5	K904393

35	Remington	700	Rifle with Leupold 4x12 scope, serial number 205325H	.270	D6232008
36	Remington	700	Rifle with Leupold 4x12 scope, serial number R101248	.300	C6415555
37	Remington	700	Rifle with Nikon 4x4 scope, serial number 2202632	.300	T6250252
38	Weatherby	Mark V	Rifle with Vortex 4- 16x44 scope, serial number 030175	.280	AB003427
39	Smith and Wesson	Pro Hunter FX	Rifle with Leupold 3x9 scope, serial number 463347AA	209 x 50	VEF4028

Caliber	Rounds
12 Gauge	3,933
30-06	477
.35 Whelen	44
410 Gauge	63
.300 Win Mag	78
.22 LR	2,261
.32 Win SPEC	40
6mm	20
.280 Rem	129
.270 Win	181
.300 Savage	190
.243 Win	352
.25-06	62
.22-250	180
.204 Ruger	325
.44	443
.45	341
.17	50
.223	713
7mm	85
7mm Rem Mag	20
.30-30	25
.340 Wea Mag	177
.300 Wea Mag	99
.308	19
.35 Rem	60
.38 SPC	84
.357	203
.40	227

said firearms and ammunition having been shipped and transported in interstate commerce.

In violation of Title 18, United States Code, Sections 922(g)(8) and 924(a)(2).

THE GRAND JURY FINDS:

FORFEITURE ALLEGATION

1. The allegations contained in Counts One and Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

2. Pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922(g)(8) and 924(c), the defendant,

GREGORY ROSSI,

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses and any firearms and ammunition involved in the commission of the offense. The property to be forfeited includes, but is not limited

to, the following:

No.	Make	Model	Type	Caliber	Serial #
1	Glock	23	Handgun	.40	GVV913
2	Beretta	96 Brigadier	Handgun	.40	BER133038
3	Taurus	Judge	Handgun	.45 LC/.410 Gauge	ER401754
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			6.5x20x50 scope, serial number G822459		
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35	Remington	700	Rifle with Leupold 4x12 scope,	.270	D6232008

			serial number 205325H		
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7mm	85
7mm Rem Mag	20
.30-30	25
.340 Wea Mag	177
.300 Wea Mag	99
.308	19
.35 Rem	60
.38 SPC	84
.357	203
.40	227

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a

third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

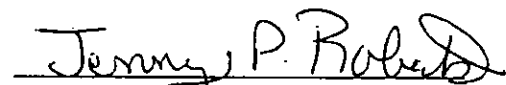
A TRUE BILL

Dated: 9.3.8



DAVID J. FREED
UNITED STATES ATTORNEY

Dated: 9/3/19



Jenny R. Roberts
Assistant United States Attorney